



# 2023 ANNUAL REPORT

ANNUAL COMMISSION REPORT TO THE GEORGIA GENERAL ASSEMBLY

IN ACCORDANCE WITH O.C.G.A. §§ 16-12-203(9), 16-12-204(c)(2), 16-12-214(a) and (b)

## **Georgia Access to Medical Cannabis Commission**

7 Martin Luther King, Jr. Drive, Southwest, Suite 146

Atlanta, GA 30334

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[www.gmcc.ga.gov](http://www.gmcc.ga.gov)



## Georgia Access to Medical Cannabis Commission

*Sidney Johnson III, M.G.A., Chair*

*Danielle Benson, Vice Chair*

*William Bornstein, MD*

*Christopher Edwards, MD*

*Judith Rochon, MD*

*William Prather, R.Ph*

*Charles Welch, Jr.*

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### MEMORANDUM

**TO** MEMBERS OF THE GEORGIA GENERAL ASSEMBLY

**FROM** GEORGIA ACCESS TO MEDICAL CANNABIS COMMISSION  
ANDREW L. TURNAGE, EXECUTIVE DIRECTOR<sup>AT</sup>

**DATE** JANUARY 25, 2023

**SUBJECT** MANDATORY ANNUAL REPORTS & SUPPLEMENTAL INFORMATION

The Commission is pleased to report the issuance of two (2) Class 1 Production Licenses as well as the promulgation of rules for the growth and manufacturing of medical cannabis, the production of low-THC oil and products, product safety testing, independent laboratory registrations, and the dispensing of low-THC oil and products to registered patients and caregivers.

The Georgia Access to Medical Cannabis Commission's annual report fulfills the agency's statutory reporting obligations under Georgia's Hope Act which include: a) proposed legislative changes, b) low-THC oil production report, and c) minority- and women-owned business study. Also included in the report is a timeline of Commission events, the Commission's collection of revenue (actual and projected), and agency milestones.

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## COMMISSION MEMBERS



**COMMISSION CHAIR**  
**SIDNEY JOHNSON, III**

Sidney "Sid" Johnson, III, M.G.A., is a Public Service Assistant at The University of Georgia Carl Vinson Institute of Government. Sid is the former Commissioner of the Georgia Department of Administrative Services, Director of Stimulus Accountability, and Director of Implementation for the Commission for a New Georgia.



**VICE CHAIR**  
**DANIELLE BENSON**

Danielle Benson is a small business owner and Vice President of Candid Construction Services, LLC.



**MEMBER**  
**DR. WILLIAM BORNSTEIN**

William "Bill" Bornstein M.D., Ph.D., is the Chief Medical Officer and Chief Quality & Patient Safety Officer at Emory Healthcare.



**MEMBER**  
**DR. CHRISTOPHER EDWARDS**

Christopher Edwards, M.D., is the Principal Surgeon at Atlanta Neurological & Spine Institute.



**MEMBER**  
**DR. JUDITH ROCHON**

Judith Rochon, M.D., is a Psychiatry Specialist for Kaiser Permanente Behavioral Health Department.



**MEMBER**  
**WILLIAM PRATHER**

William "Bill" Prather, RPh., is a licensed Pharmacist, the past President of the Georgia Board of Pharmacy, and has served on the Georgia Board of Pharmacy for 19 years.



**MEMBER**  
**CHARLES WELCH, JR.**

Charles "Chuck" Welch, Jr. is a Contractor, former bank director, and former Councilman in the City of Cumming, Georgia.

## COMMISSION STAFF

Andrew Turnage, Executive Director  
Jansen Head, General Counsel  
Pam Jones, Director Of Investigations  
Nichole Hill, Paralegal  
Perry Walden, Inspections Manager  
Alex Wood, Complaints & Compliance Manager

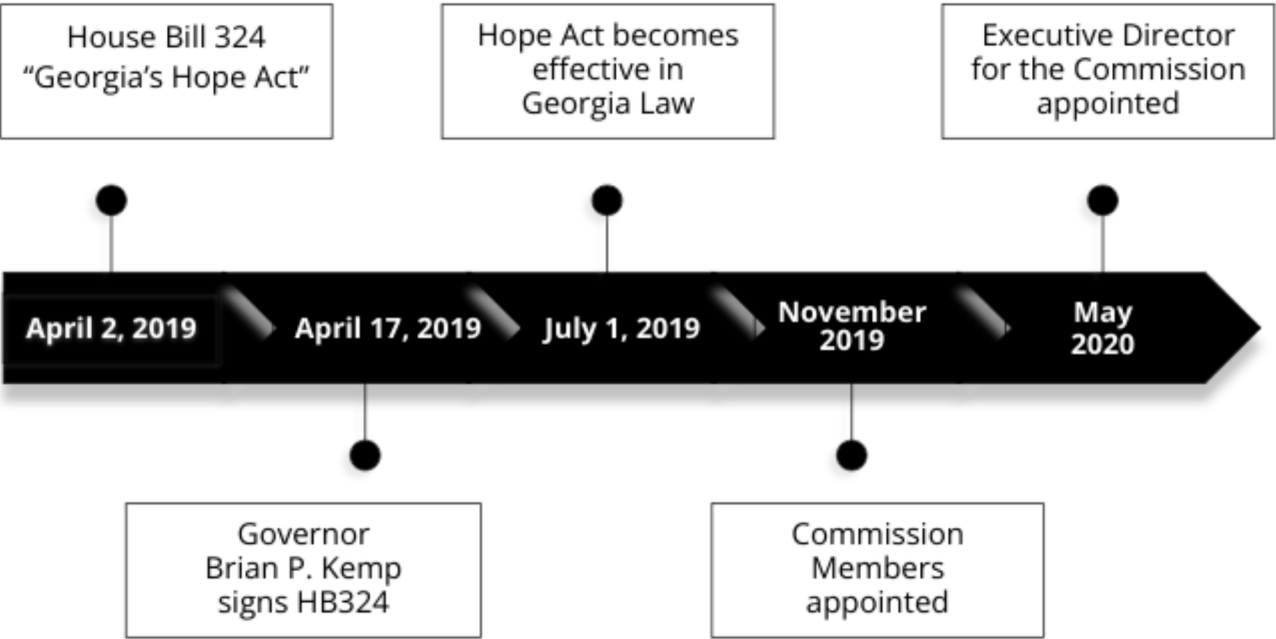
## HISTORY AND PURPOSE OF THE COMMISSION

O.C.G.A. § 16-12-200 et seq., as amended and commonly referred to as the Georgia's Hope Act , established the Georgia Access to Medical Cannabis Commission ("GMCC" or the "Commission") as the State of Georgia regulatory compliance agency to oversee the secure, indoor cultivation and manufacturing of medical cannabis for the purpose of producing low-THC oil and products for patients registered on the Georgia Department of Public Health's Low-THC Oil Patient Registry. The Commission oversees the growing of cannabis, product manufacturing, quality assurance, laboratory testing, seed-to-sale tracking, transportation, and dispensing. The Commission encourages active participation by minority, women, and veteran owned businesses and economic development in Tier 1 and Tier 2 counties.

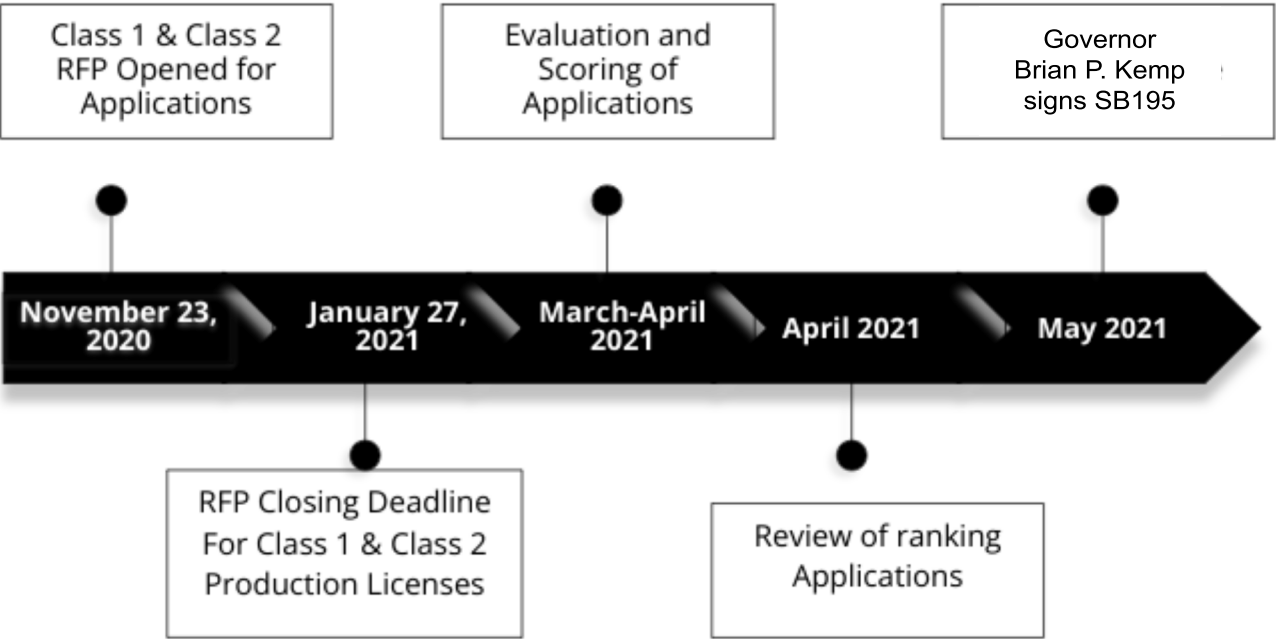
The Commission oversees licensing and registration of production facilities, dispensaries, independent testing laboratories, designated universities, and research universities. GMCC is responsible for the facility inspections, compliance, complaints investigations for its licenses and registrations. Seven members are appointed to serve on the Commission: The Chair and two members are appointed by the Governor, two members are appointed by the Lieutenant Governor, and two members are appointed by the Speaker of the House. The Commission has one office location headquartered at 7 Martin Luther King Jr. Drive, Suite 146 in Atlanta, Georgia 30334.

# TIMELINE OF COMMISSION EVENTS

## 2019 - 2020

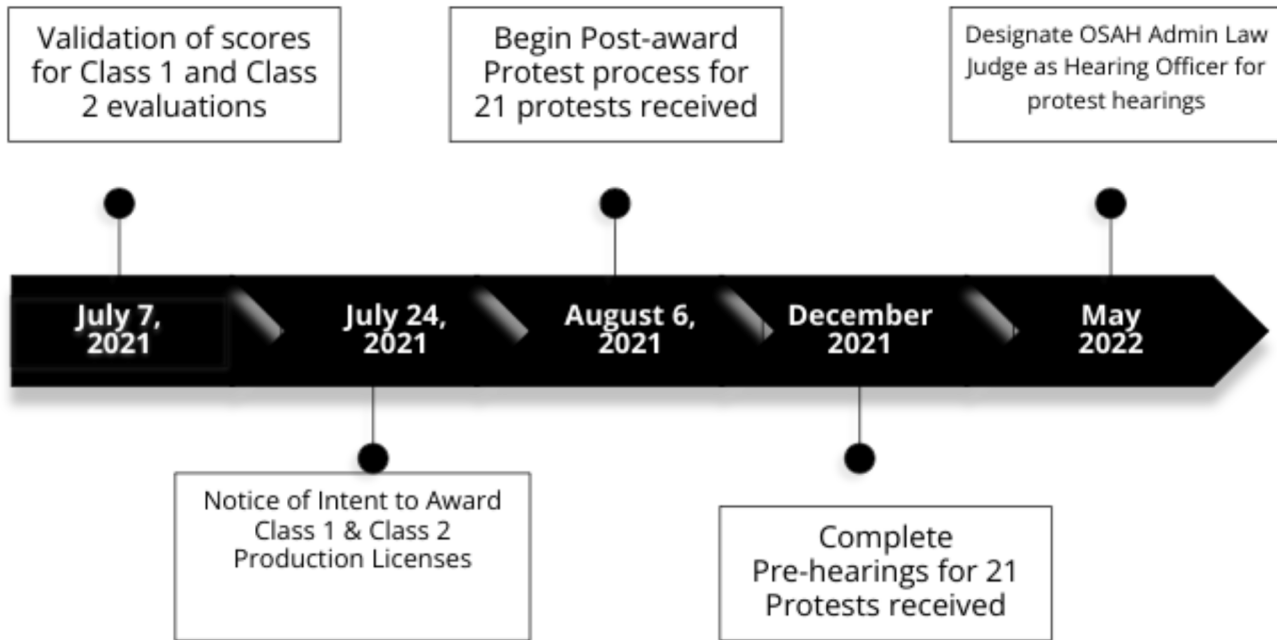


## 2020 - 2021

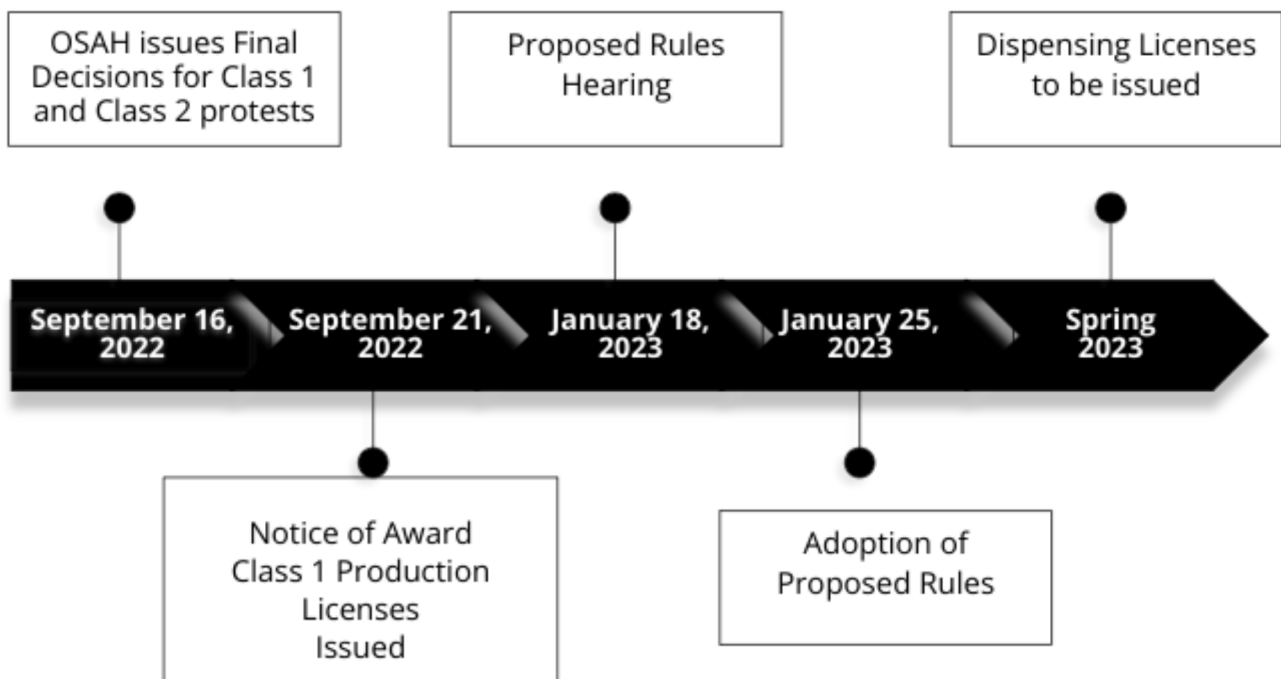


## TIMELINE OF COMMISSION EVENTS (CONTINUED)

### 2021 - 2022



### 2022 - 2023



# MILESTONES

## PRODUCTION LICENSES

In April 2022, the Governor allocated additional funding for the Commission to move the post-award protest hearings to the Office of State Administrative Hearings (OSAH). The hearing officer issued final decisions on September 16, 2022, and OSAH upheld the Commission's initial Notice of Intent to Award (See *Exhibit 3 - Official Report of Final Decisions*). The Commission issued its Notice of Award for Class 1 Production Licenses on September 21, 2022 and subsequently awarded both of its Class 1 Production Licenses authorized under the Act.

### Class 1 Production Licenses

- Botanical Sciences LLC - Glennville / Tattnall County
- Trulieve GA, Inc. - Adel / Cook County

## DISPENSING LICENSES

The Georgia's Hope Act authorizes the Commission to issue five dispensing licensees to each Class 1 production licensee and each Class 2 production licensee for retail outlets to dispense low-THC oil and products to registered patients. The Act also authorizes the Commission to issue one additional dispensing license to each of those licensees when the Georgia Department of Public Health's Low-THC Oil Patient Registry reaches 25,000 patients and for every increase of 10,000 patients thereafter. The number of patients on the registry has risen from 20,000 in 2021 to over 25,000 in 2022, a 20% increase.

## RULES AND REGULATIONS

In July 2022, the Commission worked with the House and Senate Members of the Medical Cannabis Oversight Committee to develop recommendations for independent laboratory rules. The Commission issued Notices of Proposed Ruling Making on December 16, 2022 for agency draft rules and held a public hearing for comments on January 18, 2023. A Commission meeting was duly noticed for January 25, 2023 for the purpose of adopting the [Proposed Rules Chapter 351-1 through Chapter 351-8](#).



## OPERATIONS

The Commission held three (3) meetings in 2022 including the Special Called Commission meeting to announce the Notice of Award of Class 1 Production Licenses. Since the licenses were issued, the Commission has conducted six site visit inspections with licensees. The Commission has filled all of the staff positions that have been funded for FY23.

## COLLECTION OF REVENUE

As of January 1, 2023, the Commission collected \$400,000 in license fees from Class 1 Production Licensees in FY23. The Commission projects total revenue collections for FY23 to be \$1,280,000 through the collection of statutory license fees for Class 1 and Class 2 production licenses, dispensing license application and license fees, and independent laboratory registration fees. A projection of revenue collected for FY23-FY25 may be found in *Exhibit 4 - FY23-FY25 Projected Revenue Collection*.

## BUDGET

The Commission receives funding solely through appropriations. The Commission is not authorized to retain and utilize application and license fees it collects. All fees are remitted to the Treasury upon receipt with no funds retained by the Commission per statute. For FY24, the Commission budget request of \$3,331,600 (See *Exhibit 1 - FY24 Budget Request*) sets forth the funding needs for additional staffing, vehicles, equipment, contractual services, and systems to regulate and oversee cannabis production and dispensing, protect public health and safety, and ensure the well-being of patients. In 2019, the Governor's Office of Planning and Budget (OPB) signed and approved a Budget Memo when the new Commission was created to fund the agency with a \$1.2 million budget. Now in its fifth fiscal year, the Commission still has not been fully funded as outlined in its funding history below:

- **FY19** \$225,000 (81% less than the OPB budget memo)
- **FY20** \$211,000 (83% less than the FY19 OPB budget memo)
- **FY21** \$531,000 (\$225K + \$306K AFY21 - 56% less than the FY19 OPB budget memo)
- **FY22** \$847,327 (\$225K + \$622K AFY22 - 29% less than the FY19 OPB budget memo)
- **FY23** \$908,686 (24% less than the OPB FY19 budget memo)

## LEGISLATIVE RECOMMENDATIONS

The Georgia's Hope Act (O.C.G.A. § 16-12-203(9)) requires the Commission to recommend legislative changes annually, if necessary. The Commission has provided the individual components of the proposed legislative recommendations in *Exhibit 2 - Legislative Recommendations*.

These recommendations address the critical need for the authority to fingerprint applicants for dispensing licenses and other registrations. Further, the Commission recommends application of the Georgia Administrative Procedure Act (APA) in certain actions and proceedings which will provide more consistency and transparency in the processes and activities of the Commission. Finally, the necessary proposed clean up language has been included and amended to ensure consistency throughout the Act.

## DESIGNATED UNIVERSITY PRODUCTION REPORT

The Georgia's Hope Act (O.C.G.A. § 16-12-204(c)(2)) requires the Commission to report low-THC oil production by Designated Universities to the Senate Health and Human Services Committee and the House Committee on Health and Human Services for the preceding calendar year. Currently, there are no Designated Universities producing low-THC oil, or that have required reporting items, for the calendar year 2022.

## MINORITY- AND WOMEN-OWNED BUSINESS STUDY

As required by the Georgia's Hope Act (O.C.G.A. § 16-12-214(c)(2)), the Commission will undertake a retrospective study of the participation of minority and women owned businesses as licensees issued under Part 2 of the Act every four years: 2022, 2026, 2030, 2034, 2038, 2042, etc. Two (2) Class 1 Production Licenses, which were issued on September 21, 2022. One of the two (50%) Class 1 Production Licenses issued was to a Woman-owned and Minority Business Enterprise certified business.

## EXHIBITS

## **EXHIBIT 1**

### **FISCAL YEAR 2024 BUDGET REQUEST**



## Georgia Access to Medical Cannabis Commission

*Sidney Johnson III, M.G.A., Chair*

*Danielle Benson, Vice Chair  
Judith Rochon, MD*

*William Bornstein, MD  
William Prather, R.Ph*

*Christopher Edwards, MD  
Charles Welch, Jr., M.B.A.*

### MEMORANDUM

**TO:** GOVERNOR'S OFFICE OF PLANNING AND BUDGET

**FROM:** GEORGIA ACCESS TO MEDICAL CANNABIS COMMISSION  
ANDREW L. TURNAGE, EXECUTIVE DIRECTOR <sup>AT</sup>

**DATE:** SEPTEMBER 7, 2022

**SUBJECT:** FISCAL YEAR 2024 BUDGET REQUEST

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The Georgia Access to Medical Cannabis Commission (GMCC) will issue production and dispensing licenses in FY23 and have the oversight and regulatory compliance responsibility for cannabis in the State of Georgia. GMCC's FY24 budget request for \$3,331,600.00 sets forth the funding needs for staffing, vehicles, equipment, contractual services, and systems to regulate and oversee cannabis production and dispensing, protect public health and safety, and ensure the well being of patients. Since the majority of the commission's FY24 request is funding for personal services, this report provides a detailed outline of the commission's request for the personal services line. Additional supporting information regarding non-staff needs follows the personal services information and identifies one-time purchases. Finally, the report concludes with the commission's budget request by account category.

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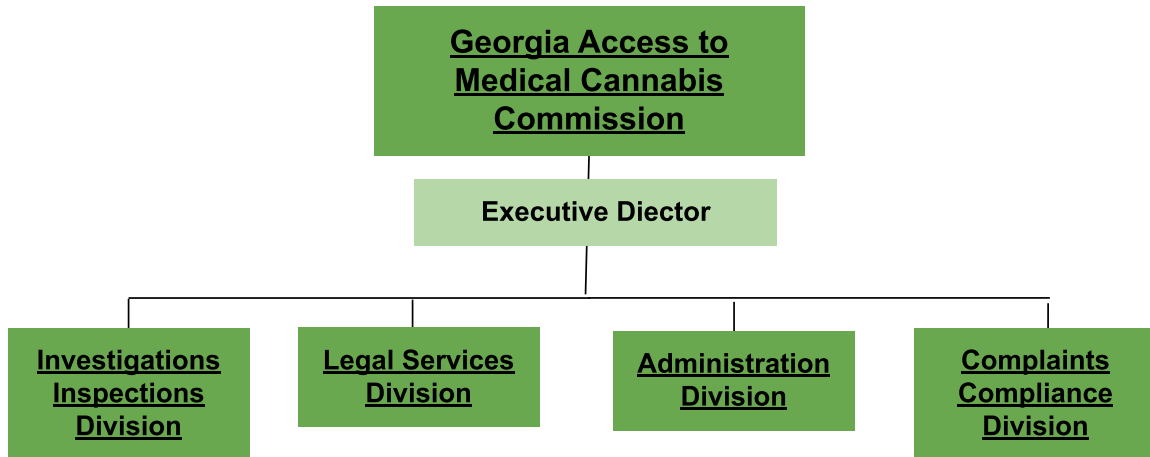


# **GEORGIA ACCESS TO MEDICAL CANNABIS COMMISSION FY24 Budget Request**

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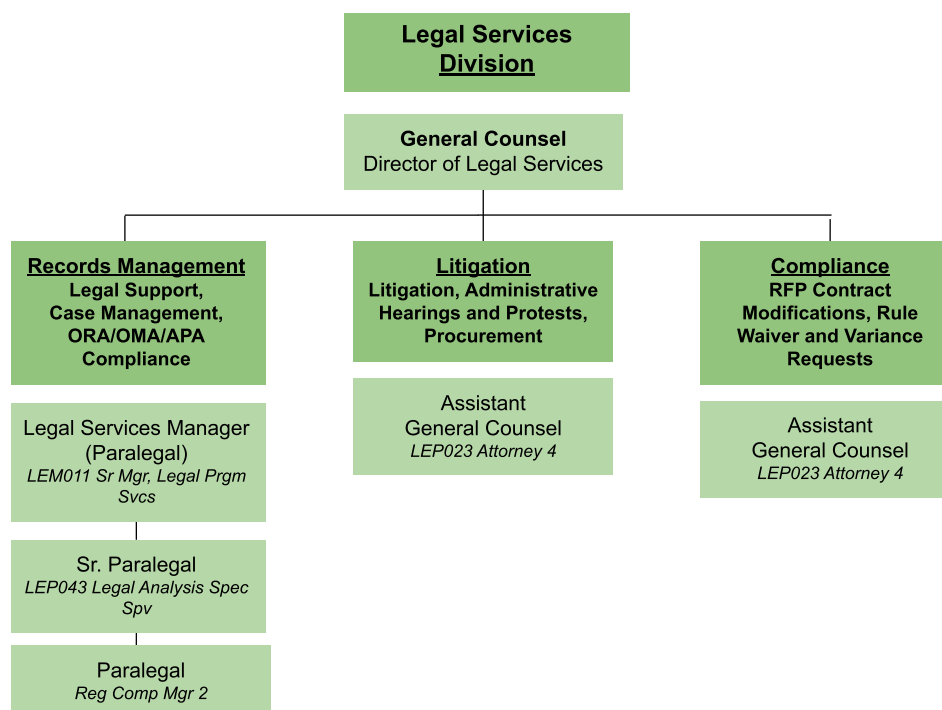
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## COMMISSION ORGANIZATION



In order to regulate cannabis properly in Georgia, GMCC requests funding for eleven (11) new positions for a total of \$2,271,000.00 which will be structured in the four divisions indicated above. The Commission will have statutory responsibility for regulatory oversight of 42 licensees, as well as the laboratory testing, transfer and distribution of regulated cannabis. In FY19 and FY20 GMCC had one staff position, its Executive Director Andrew Turnage. In FY21 GMCC had two staff positions, the Executive Director and General Counsel. In FY22 and currently in FY23, GMCC received appropriations for six staff: Executive Director, General Counsel, Director of Investigations, Regulatory Compliance Manager (2), and Paralegal. The proposed budget includes salary increases for existing personnel for increased programmatic and supervisory responsibilities. The eleven (11) new positions requested, which are outlined in the following pages, will provide the level of oversight needed for cannabis production and dispensing in the state to ensure safety and security.

## LEGAL SERVICES DIVISION



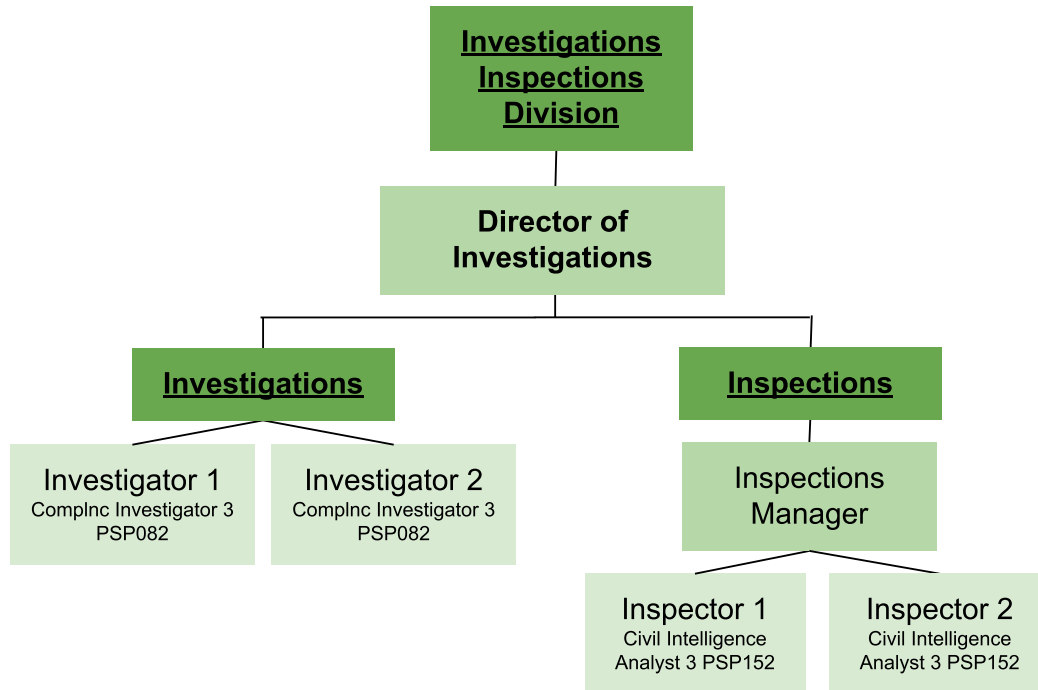
**Current Staffing:** 2 positions - General Counsel, Paralegal

**FY24 Request:** 4 staff positions - Attorney 4 (2 positions), Sr Mgr Legal Program Services, Legal Analysis Specialist Spv

**Area of need:** The positions requested will ensure the workflow of the legal division is efficient and consistent to ensure accuracy and compliance with the Open Records Act, Open Meetings Act, and the Administrative Procedure Act. The compliance positions will review and advise the Commission on proposed license contract amendments or modifications submitted to the Commission from Class 1 and Class 2 production licensees. License contracts include all applications and attachments submitted to the Commission in the competitive application process. The commission anticipates receiving a minimum of two contract modifications per week. The litigation positions will focus on reviewing and preparing responses for state and federal litigation, investigations, and audits as well as preparing staff and members of GMCC in depositions and subpoenas. The records management positions will provide support to the general counsel and attorneys to maintain the division's case and project management system, including statutory and other legal deadlines, preparing responses to complex requests for information and records. The Commission is currently processing more than fifty requests for information annually. The legal division advises the Commission and all GMCC divisions on applicable state and federal law, requests for rule waivers or variances from all licensees, permittees, and registrants, including drafting decisions and coordinating procedures.



## INVESTIGATIONS AND INSPECTIONS DIVISION

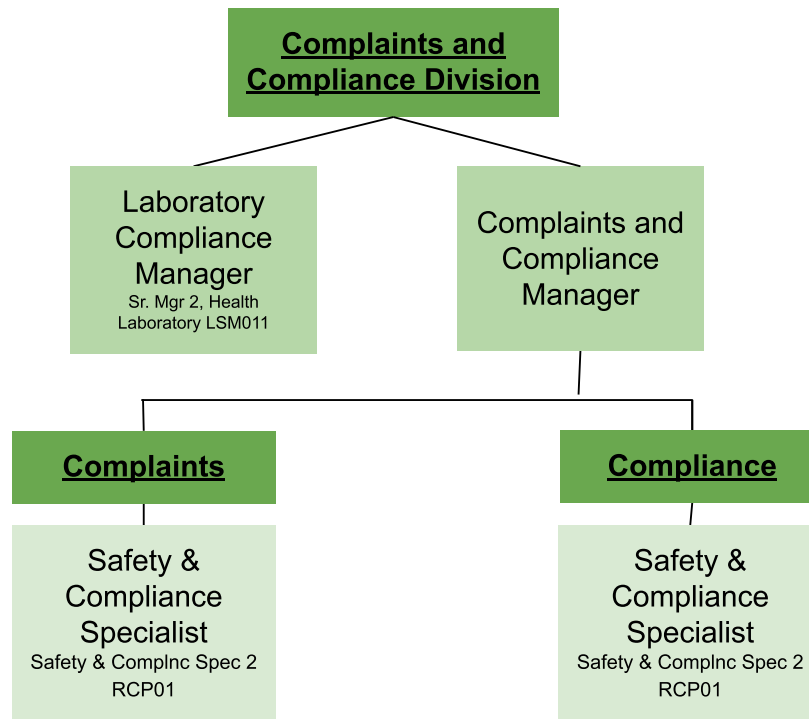


**Current Staffing:** 2 positions - Director of Investigations, Inspections Manager

**FY24 Request:** 4 staff positions - Investigator (2 positions), Inspector (2 positions)

**Area of need:** The positions requested will ensure all Commission licensees are in compliance with the Hope Act, perform inspections and investigations for compliance with policy, procedures, state and federal regulations, and enforce industry standards set by the Commission to ensure public safety, public health, security and patient safety. Inspectors will conduct routine inspections at least quarterly, and regularly as needed or ordered by the commission, to ensure licensees are compliant with rules and regulations for cannabis production, transfer, and dispensing. Investigators will conduct investigations to obtain evidence of reported unsafe cannabis products, fraud, abuse, or violation of rules, regulations, or statutes. The commission estimates receiving a minimum of one complaint per week that will require investigation. Investigators are also tasked with follow-up site visits to licensees to ensure any contract modifications are in place. The commission anticipates receiving a minimum of two contract modifications per week. The investigations division coordinates inspection assignments, case assignments, records management, enforcement of orders and serves as the point of contact with local, state and federal law enforcement.

## COMPLAINTS AND COMPLIANCE DIVISION

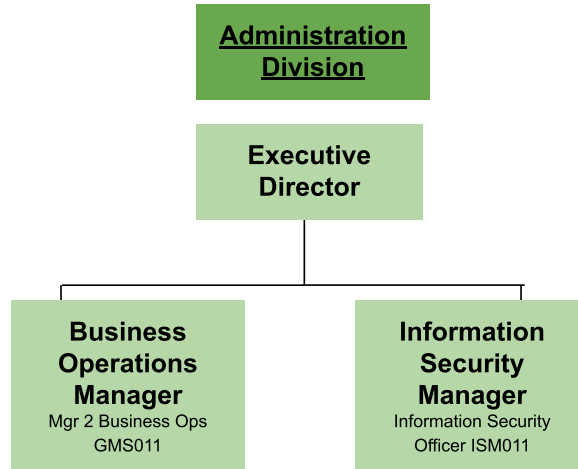


**Current Staffing:** 1 position - Complaints and Compliance Manager

**FY24 Request:** 3 staff positions - Safety & Compliance Specialist (2 positions), Laboratory Compliance Manager

**Area of need:** The positions requested will ensure commission licensees are compliant with the requirements of the Hope Act and commission rules by receiving, analyzing, and processing data and information. This division will be responsible for processing new applications and renewal applications for all license types. The complaints and compliance positions will perform intake and processing for 36 dispensing license applications and 6 production license renewals, internal and external complaint processing, collection and analysis of criminal history records, and the collection and analysis of seed-to-sale tracking data for each licensee to ensure compliance. These positions will also perform intake and processing for all complaints against the commission's licensees, and patient complaints regarding product safety. The commission estimates receiving a minimum of one complaint per week. The laboratory manager will develop and establish laboratory processes and procedures, oversee and coordinate the registration and operations of independent testing laboratories, and monitor laboratory data and certificates of analysis of cannabis products to ensure patient safety. The complaints compliance division analyzes fact patterns, databases, reports and evidence in the identification of and/or investigation of improper/illegal behavior and the referral to the appropriate division for action.

## ADMINISTRATION DIVISION



<b>Current Staffing:</b>	0 positions - (GMCC Executive Director currently handles these functions)
<b>FY24 Request:</b>	2 staff positions - Business Operations Manager, Information Security Manager
<b>Area of need:</b>	The business operations position will provide direct support for all commission staff divisions for administrative, logistics, scheduling, communication with patients and revenue collection. The commission anticipates a minimum of two to five patients calls daily. The information security position will be responsible for the development, implementation, and continuous monitoring of a comprehensive information security program for the commission, cyber preparedness, and information security for all commission devices, websites, projects, systems, data, storage, and technology.

## SYSTEMS, CONTRACTS, AND EQUIPMENT

- One-time items:** The commission's budget request includes the one-time purchase of Initial licensing software systems, 3 vehicles, phones, computers, and equipment for new legal, investigations, inspections, and complaints and compliance personnel.
- Recurring items:** The commission's budget request includes recurring administrative hearing costs, software and systems, office space, internet, telecomm, fuel and vehicle maintenance, per diem and travel/mileage reimbursement, training and certification for personnel.
- Area of need:** To meet the ongoing responsibility for oversight and regulation of cannabis as well as investigating complaints about cannabis products the Commission requests funding for the necessary IT systems and data management, three vehicles, adequate office space in the Commission's current location at 7 MLK in Atlanta (GBA), training and equipment for new personnel. This includes office productivity and licensing software, product tracking systems, contractual services, equipment, and court costs.

## BUDGET REQUEST BY CATEGORY

### Account Categories:

GMCC's FY24 budget request by account line is provided below.

Acct Name	FY24
PERSONAL SERVICES	2,270,000
REGULAR OP. EXP	209,600
VEHICLE PURCHASES	105,000
EQUIPMENT	85,000
CPU CHARGES	145,000
RENTS	80,000
TELECOMM	15,000
CAPITAL OUTLAY	0
CONTRACTS	422,000
OTHER	0
<b>TOTAL</b>	<b>3,331,600</b>

- Under Class 301 ROE:
  - What are the equipment items that would be included in the FY24 budget? The projections reflect \$35,000 under acct 616000 in class 301 and \$85,000 under class 304.
    - 301 - Class 301 is all Regular Operating Expenses which includes the following (itemized by line amount in spreadsheet emailed to you on 9/2/22): Postage, Motor Vehicle Exp, Fuel, Maintenance and Repairs, Printing and Publications, Business Cards, Printing, Educational Materials, Graphics, Supplies and Materials, Staples office supplies, lapel pins, office equipment, GBA incidentals, Repairs and Maintenance, network printer, DOAS contents/liability/risk/cybersecurity insurance, CANNRA Association, Employee Travel, Per Diem Commission Members
    - 304 - GMCC's FY24 budget request reflects the following equipment for field-based staff: Mounted lock box in vehicle, vehicle GPS, tablet stylus and case, cell phone, flash light, measuring wheel, digital audio recorder, safety equipment, lab coat, uniforms, sample collection equipment, computer bag, and air purifier (for vehicle)

- Does the Commission currently have a copier lease? I see a \$7,500 projection for a Xerox printer.
  - The Commission has not received any funding for a printer or copier for FY19, FY20, FY21, FY22, or FY23 and does not have a copier or network printer
  - All Commission staff currently share two desktop printers
- Has DOAS confirmed the insurance cost amounts for each respective type?
  - No. These are projected minimal estimates based on per capita increase and the subsequent increases across insurance categories
- What would the PSA-media buy be for? What form of media and reach would be the goal of the PSA?
  - Current Georgia law prohibits licensees from advertising to patients. GMCC's FY24 budget request is to develop a simple informational PSA in digital format, to be placed on the Commission website and made available for public use (public tv, radio, internet, etc.), to educate the public and patients about the newly implemented law, requirements, and to outline where patients can gain lawful access at licensed dispensaries around the state.
- What actions factor into the employee travel acct 640000 increase to \$75,000?
  - GMCC is responsible for quarterly and routine inspections of 42 licensed facilities at locations across the state. The travel line is a conservative estimate that accounts for more than 60 licensed facility inspections: lodging and per diem for production facility inspections, which will entail overnight travel for a minimum of two staff over a 2-4 day period to conduct, routine dispensing licensee inspections, the travel and per diem to conduct the projected number of investigations into patient/product complaints statewide. The request includes lodging, travel, and per diem for for the initial and continuing training required for staff.
- Please provide a more detailed analysis of the Supplies and Materials acct 614000 section for the projected \$30,000.
  - Office supplies, identification for personnel, non-equipment supplies for personnel such as safety personal protective equipment, as well as testing, evidence collection, and storage supplies, etc.

- Please provide a more detailed analysis of the Printing and Publications acct 613000 section for the projected \$25,000.
  - Graphics for vehicles as required by state regulations, business cards for staff, and an educational post card for registry patients with information about where dispensing licensees are located..
- Under Class 305 CPU Charges:
  - What is causing the \$25,150 increase under IT Maint and Support acct 864000?
    - GMCC's usage of Google Enterprise Plus will expand with data storage, per capita user fees, as well as maintenance and support costs.
  - What software items have been included under Software - Capitalized (Software renewal and system) acct 823000?
    - GMCC will require licensing system(s) for applications, renewals, complaints, inspections, open records requests, etc.
    - GMCC will require system(s) for seed-to-sale tracking
  - Under acct 816000 It Equip <\$5000, what is the cost of an individual Chromebook and what is the cost of the accessories that come with the machine per employee? I notice on the TeamWorks expense reports that a Monitor and Dock are associated purchases.
    - GMCC's most recent purchase of DELL Chromebook cost \$1325
    - GMCC's most recent purchase of a docking station cost \$286
    - GMCC's most recent purchase of an external monitor cost \$219
  - Under acct 816000 It Equip <\$5000, what is the purpose of the Samsung Galaxy S7 tablets given the Chromebook's capabilities?
    - Chromebook laptops are designed for in-office use indoors using productivity suite style software and will not survive regular travel and field use with dirt, moisture, bumps, drops etc. The S7 tablets are designed for rugged field use with shatterproof glass, water protection, etc. and will be used with protective cases (office supply) by the inspectors and investigators in their daily field based operations.
- Under Class 306 Rental Charges:
  - What build outs will require the increase in rental costs?

- GMCC anticipates minimal build-out/renovation costs in the FY24 budget request. The increase for additional space is only to accommodate six staff. GBA indicates available space is move-in ready. Anticipated costs here would include internet (hardware installation), and door/entry access. Note that investigators and inspectors, which are primarily field based, will utilize a 'rotation' for use of space at 7 MLK. GMCC is not requesting office space for these staff.
- Will the Commission be expanding its current office or relocating?
  - GMCC's FY24 budget request outlines funding to acquire additional space for six staff which is available in adjacent or nearby suites at its current location at 7 MLK. The rate will be similar to, or lower than, GMCC's current square foot rate for 7 MLK Suite 146, which is the lowest on Capitol Hill.
- Under Class 307, I notice the Telecommunication amount does not increase much with the expected increase in positions. Why is that?
  - GMCC utilizes a shared access point for internet and voice over internet protocol for its office based telecom. The increase projected in GMCC's FY24 budget request is for per capita VOIP, an additional in-office wired internet access point, and wireless telecommunications for field based staff.
- Under Class 312 Contracts,
  - What items are included in the Other Contract Services acct 653000 for \$200,000?
    - GMCC's FY24 request for Contract services includes seed-to-sale tracking (STS), laboratory testing, technology integration, and communications.
  - Has the commission sought quotes for any of the technology items?
  - GMCC has researched the cost of contractual services for components required in the Hope Act in other state with similar programs. To the extent that these contractual services exceed \$25,000 in value an RFQ/RFP will be required under state procurement laws to obtain a 'quote' in the form of a bid. As such, GMCC estimates the cost of seed-to-sale tracking, and IT services to be between \$50,000 - \$80,000. Similarly, GMCC anticipates the cost of reference laboratory testing as routine and continuous expense for regulating cannabis. ongoing. The State of Georgia does not have a reference laboratory. Since the Commission is charged with ensuring the purity, accurate potency, and dosage levels this complex laboratory testing panel function must be outsourced. Although no specific quote has been obtained for laboratory testing, the average price



for a single multi-panel test is projected to be between \$700-\$1,000. If just 20% of GMCC's anticipated complaints received require testing, GMCC projects reference laboratory costs to be a minimum of \$10,000.

- For technology items where the licensee requires access or integration, is the commission responsible for that cost or solely its portion to connect and set up the network?
- Current Georgia law requires licensees to be responsible for their own contract costs. GMCC's FY24 budget request is for its portion to connect to the reporting platform, integration into the existing data storage system, and data storage.
- What does CGI represent and what services are provided?
  - GCI is Georgia Correctional Industries. GCI has the statewide contract for a variety of items and services.
- What does the increase in amounts for the SADA professional services represent under acct 851000? TeamWorks reflects a smaller amount for expenses to SADA in FY22.
  - GMCC's FY24 request reflects the necessary system integration between various software platforms, regular maintenance, regular usage fees, and per capita user access increases
- What are the recurring OSAH administrative hearing costs related to once the initial award protest hearings are complete?
  - GMCC's FY24 budget request reflects the anticipation that any fine issued by the Commission could result in a contested matter that requires adjudication by a hearing officer. The line item estimate listed is based on the OSAH funding provided by the Governor's emergency budget funding to conduct 22 protest hearings in FY22. Under current law, the Commission will regulate 42 licensees. If GMCC issues just one citation to each licensee, and only half of the 42 fines issued are contested, the estimated cost is a conservative estimate of costs likely to be incurred. GMCC is not requesting funding in FY24 for production license protests as the process will be complete. The funds requested will be utilized for non-litigation hearings with licensees who are represented by counsel. A final note on administrative hearing costs, however: any increase in the number of production licenses the Commission has statutory authority to issue would dramatically change this line item.

## **EXHIBIT 2**

### **2023 LEGISLATIVE RECOMMENDATIONS**

## **16-12-200: Definitions**

16-12-200(8) “Dispensary” means the physical location of a dispensing license.

~~(8)~~ (9) “Dispense” means the sale or provision of low THC oil and products to registered patients by a dispensing licensee.

~~(9)~~ (10) “Dispensing license” means a specialty license issued by the State Board of Pharmacy or the commission pursuant to Code Section 16-12-206 to dispense low THC oil and products to registered patients.

~~(10)~~ (11) “Grow” means cultivating and harvesting cannabis for use in producing low THC oil and products.

~~(11)~~ (12) “Licensee” means any business, or owner of such business, with a valid license issued pursuant to this article.

~~(12)~~ (13) “Low THC oil” shall have the same meaning as set forth in Code Section 16-12-190.

~~(13)~~ (14) “Manufacture” means to process cannabis to produce low THC oil and products.

~~(14)~~ (15) “Owner” means any person who directly or indirectly owns, actually or beneficially, or controls 5 percent or greater of interests of the applicant or any licensee. In the event that one person owns a beneficial right to interests and another person holds the voting rights with respect to such interests, then both shall be considered an owner of such interests.

~~(15)~~ (16) “Product” means low THC oil delivered through an oil, tincture, transdermal patch, lotion, or capsule, except as prohibited by Code Section 16-12-234, but not including any food products infused with low THC oil, including, but not limited to, cookies, candies, or edibles.

~~(16)~~ (17) “Registered patient” means an individual who is legally authorized to possess and use low THC oil and products pursuant to Code Section 31-2A-18.

~~(17)~~ (18) “Tracking system” means a seed-to-sale tracking system to track ~~marijuana~~ cannabis that is grown, processed, manufactured, transferred, stored, or disposed of and low THC oil and products that are transferred, stored, sold, dispensed, or disposed of pursuant to this article.

## **16-12-203: Powers, duties and responsibilities.**

The commission shall have the following powers, duties, and responsibilities to implement and enforce the provisions of this article:

16-12-203(2) To execute a contract or contracts ~~to purchase or obtain low THC oil, cannabis, cannabinoids, or any other derivative, compound, or substantially similar products from any available legal source and to provide logistics related thereto in accordance with this article.~~ to provide for the regulated production, growing, manufacturing, and dispensing of low-THC oil and products in Georgia for the lawful access to medical cannabis by patients on the Georgia Low THC Oil Patient Registry established and maintained pursuant to Code Section 31-2A-18. Such contract or contracts may be executed with one or more qualified corporations or with one or more governmental entities and: ~~Purchases made pursuant to this paragraph shall not be~~

subject to state purchasing laws contained in Article 3 of Chapter 5 of Title 50 or in other provisions of the Official Code of Georgia Annotated;

(5) To establish and enforce rules, requirements, and procedures for inspecting production facilities operated by designated universities licensed as production facilities;

(6) To establish and enforce rules, requirements, and procedures for the regulation of cannabis under this article to ensure quality control, security, and oversight of low THC oil and products in this state, including, but not limited to, cultivation, production, testing, transfer, transportation, dispensing, and research, as well as testing for purity, and dosage levels, and verification that product packaging and labels accurately reflect product content;

(10) To coordinate its activities with the Department of Public Health, the Medical Composite Board, the Board of Pharmacy, the University System of Georgia, the Georgia Drugs and Narcotics Agency, and the Georgia Bureau of Investigation;

(16) To establish and enforce qualifications for licensure, registrations, and permits;

(18) To require all initial and renewal applicants for a license, registration, or permit under this article to submit an application or registration on a form established by the Commission, together with at least one set of classifiable electronically recorded fingerprints submitted to the commission in accordance with the fingerprint system of identification and established by the director of the Federal Bureau of Investigation. The commission shall transmit the fingerprints to the Georgia Crime Information Center, which shall submit the fingerprints to the Federal Bureau of Investigation for a search of bureau records and an appropriate report and shall promptly conduct a search of state records based upon the fingerprints. After receiving the report from the Georgia Crime Information Center and the Federal Bureau of Investigation, the commission shall review the record for all owners, officers, and employees of the applicant demonstrating a lack of convictions, except for felony connections that are greater than 10 years old, are not drug related, or have been expunged or pardoned;

(19) To conduct all investigations and inspections in a manner that protects the confidentiality of persons who file complaints with the commission. The commission shall not make public the names or any other identifying information about complainants unless such disclosure is required by law or court order; and

(20) To create licenses, permits, and registrations, and to establish the standards, procedures, and fines for failure to operate in accordance with rules and regulations established by the commission, to ensure safe and secure research, laboratory testing, transfer, transportation, distribution, and disposal of cannabis.

**16-12-204: Issuance of non transferable designated university licenses for production of low THC oil and products; research on therapeutic use; reporting; collected information; license revocation.**

16-12-204(a):

~~Upon request by a designated university,~~ The commission shall be authorized to issue a non transferable designated university production licenses for the production of low THC oil and products. The production licenses granted to designated universities pursuant to this Code section shall be in addition to any other production licenses issued pursuant to Part 2 of this article. The designated universities shall have the option to be licensed and regulated by the commission as a production licensee facility, either separately or jointly. The designated universities shall be authorized to contract with private entities to fulfill the terms of the production license, including contracting for the production of low THC oil and products. All contracts shall be approved by the commission.

(d):

The commission may fine or revoke the license of a designated university if it is found by the commission to have violated any of the requirements established pursuant to this article or any rules and regulations of the commission. A designated university whose license has been revoked by the commission may file an appeal in the Superior Court of Fulton County in accordance with Chapter 13 of Title 50, the “Georgia Administrative Procedure Act.”

(e):

The commission shall have the authority to refuse to grant a license to a designated university, without a hearing, upon a finding by a majority of the commission that the application for such license fails to demonstrate the qualifications or standards contained in this code section, or under the laws, rules, or regulations under which such license is sought; provided, however, that the designated university seeking such license shall be allowed to appear before the commission if such designated university requests such appearance;

**16-12-206: Annual, nontransferable dispensing license; adoption of rules; fees.**

16-12-206(a)(2) The commission shall be authorized to issue five dispensing licenses to each Class 1 production licensee and each Class 2 production licensee ~~for retail outlets~~ to dispense

low THC oil and products to registered patients. The commission shall ensure that dispensing licenses shall be issued so that ~~retail outlets-dispensaries~~ are dispersed throughout the state. The commission shall develop rules and regulations regarding ~~retail~~ dispensing licenses in this state in accordance with the requirements contained in subsection (b) of this Code section. The commission shall be authorized to issue one additional dispensing license to each Class 1 production licensee and each Class 2 production licensee when the Low THC Oil Patient Registry established and maintained pursuant to Code Section 31-2A-18 reaches 25,000 patients and for every increase of 10,000 patients thereafter.

(b) The State Board of Pharmacy and the commission shall be authorized to separately adopt and enforce rules relating to the dispensing of low THC oil and products, with the State Board of Pharmacy promulgating rules and regulations for dispensing pharmacies that dispense low THC oil and products and the commission promulgating rules and regulations for other ~~retail outlets~~ dispensing licensees that dispense low THC oil and products. Such rules shall include, but not be limited to:

- (1) Standards, procedures, and protocols ~~for the effective use to ensure the safe and secure~~ dispensing of low THC oil and products as authorized by state law and related rules and regulations;
- (2) Standards, procedures, and protocols for the dispensing of low THC oil and products by a ~~pharmacy with a~~ dispensing pharmacy license and by ~~retail~~ dispensing licensees and for the utilization of a tracking system;
- (3) Procedures and protocols for the acquisition, transfer, distribution, tracking, and sale of low THC oil and products, and to provide that no low THC oil or products may be sold to, or transferred to a location outside of this state;
- (4) The establishment of standards, procedures, and protocols for determining the amount of usable low THC oil and products that is necessary to constitute an adequate supply for registered patients in this state to ensure uninterrupted availability for a period of one month; ~~including amounts for topical treatments;~~
- (5) The establishment of standards, procedures, and protocols to ensure that all low THC oil and products dispensed are consistently pharmaceutical grade;
- (6) The establishment of standards and procedures for the denial, revocation, suspension, and nonrenewal of dispensing licenses;
- (7) The establishment of other licensing, renewal, and operational standards which are deemed necessary by the State Board of Pharmacy and the commission;
- (8) The establishment of standards and procedures for testing low THC oil and products for levels of tetrahydrocannabinol or other testing parameters deemed appropriate by the State Board of Pharmacy and the commission;
- (9) The establishment of health, safety, and security requirements for pharmacies and ~~retail~~ dispensing licensees dispensing low THC oil and products;

(10) Requirements for the issuance of dispensing licenses to pharmacies ~~and~~, Class 1 production licensees, and Class 2 production licensees;

(11) The establishment of advertising and marketing rules; and

(12) The establishment of fines for failure by a dispensing pharmacy licensee or by a dispensing licensee to operate in accordance with rules and regulations.

(c) The commission shall be authorized, by rules and regulations, to establish terms and fees for the issuance and renewal of dispensing licenses to Class 1 production licensees and Class 2 production licensees commensurate with the locations of the ~~retail outlet~~ dispensaries and demand for low THC oil and products at such locations.

(d) The commission shall have the authority to refuse to grant a dispensing license, without a hearing, upon a finding by a majority of the commission that the application for such a license fails to demonstrate the qualifications or standards contained in this code section, or under the laws, rules, or regulations under which such license is sought; provided, however, that the applicant seeking such license shall be allowed to appear before the commission if such applicant requests such appearance;

(e) A dispensing licensee whose license has been revoked or has been refused to be renewed by the commission may file an appeal in the Superior Court of Fulton County in accordance with Chapter 13 of Title 50, the “Georgia Administrative Procedure Act.”

**16-12-210: Powers, duties, and responsibilities of Commission; no undue burden on patients.**

16-12-210(a) The commission shall have the following powers, duties, and responsibilities to implement and enforce the provisions of this part:

(1) Issue licenses and registrations related to the production, growing, ~~and~~ manufacturing, testing, tracking, transportation, and dispensing of low THC oil and products in accordance with the provisions of this part;

**16-12-215: Limitation on locations; advertising or marketing prohibited; information available to physicians.**

16-12-215(b) No licensee shall advertise or market low THC oil or products to registered patients or the public; provided, however, that a licensee shall be authorized to provide product safety, dosage, side effect, and drug interaction information regarding its low THC oil and products ~~directly~~ to physicians and registered patients, subject to any rules and regulations set forth by the Commission.

**16-12-217: On-demand access to facilities; provision of samples; testing; secured transportation.**

16-12-217(b) Each Class 1 production licensee and Class 2 production licensee shall contract with a registered laboratory on the commission's approved list of independent laboratories, subject to any requirements set by the commission, for purposes of testing low THC oil and products manufactured by such licensees. Low THC oil and products shall be analyzed for potency, foreign matter, microbial presence, pesticides, heavy metals, and residual solvents. The commission shall establish limits for each item tested to verify that such low THC oil and products meet the requirements of this part. The commission shall promulgate rules and regulations governing the operations and registration of laboratories for the testing of low THC oil and products. The costs of laboratory testing shall be paid by the licensees. Each low THC oil product shall be required to pass all requirements established by the commission before being distributed or transferred. Products that do not pass the commission's requirements shall be destroyed by the licensee and proof of such destruction shall be sent to the commission upon request.

(d) The commission may revoke the registration of an independent laboratory if it is found by the commission to have violated any of the requirements established pursuant to this article or any rules and regulations of the commission. An independent laboratory whose registration has been revoked by the commission may file an appeal in the Superior Court of Fulton County in accordance with Chapter 13 of Title 50, the "Georgia Administrative Procedure Act."

(e) The commission shall have the authority to refuse to approve a registration to an independent laboratory, without a hearing, upon a finding by a majority of the commission that the application for such registration fails to demonstrate the qualifications or standards contained in this code section, or under the laws, rules, or regulations under which such registration is sought; provided, however, that the independent laboratory seeking such registration shall be allowed to appear before the commission if such independent laboratory requests such appearance.

**16-12-220: Confidential nature of data; exclusion; patient privacy.**

16-12-220(a) All working papers, recorded information, documents, and copies produced by, obtained by, or disclosed to the commission ~~pursuant to the activities conducted pursuant to this part~~ Code Sections 16-12-211 and 16-12-212, other than information published in an official commission report regarding the activities conducted pursuant to ~~this article~~ Code Sections 16-12-211, 16-12-212, and 16-12-221, shall be confidential data and shall not be subject to Article 4 of Chapter 18 of Title 50 until a Notice of Intent to Award or Notice of Award is issued by the Commission, whichever occurs first; provided, however, that any contract, memorandum



of understanding, or cooperative endeavor agreement entered into by the commission pursuant to this article shall be subject to Article 4 of Chapter 18 of Title 50.

**16-12-235.1: Possession of THC oil and products by colleges and universities for research purposes; permitting requirements; inspection.**

(a) The commission shall be authorized to issue permits for colleges and universities located within the State of Georgia to possess limited quantities of low THC oil and products for purposes of conducting medical research via a bona fide partnership with a Class 1 or Class 2 licensee and to establish standards, procedures, rules and regulations for such permittees. Such permits shall be for a Georgia based college or university that:

(d) At the conclusion of the research study, the institution shall submit a report to the commission, the Senate Health and Human Services Committee, and the House Committee on Health and Human Services, to include data and outcomes of the study conducted pursuant to this code section.

(e) The commission may revoke the permit of a college or university if it is found by the commission to have violated any of the requirements established pursuant to this article or any rules and regulations of the commission. A college or university whose permit has been revoked by the commission, prior to the end date of the study, may file an appeal in the Superior Court of Fulton County in accordance with Chapter 13 of Title 50, the “Georgia Administrative Procedure Act.”

(f) The commission shall have the authority to refuse to issue a permit to a college or university, without a hearing, upon a finding by a majority of the commission that the application for such permit fails to demonstrate the qualifications or standards contained in this code section, or under the laws, rules, or regulations under which such permit is sought; provided, however, that the college or university seeking such permit shall be allowed to appear before the commission if such college or university requests such appearance.

## **EXHIBIT 3**

### **OFFICIAL REPORT OF FINAL DECISIONS**



## REPORT OF FINAL DECISIONS

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<b>Solicitation Title/Event Name:</b>	Competitive Application Request for Proposals for Class 1 and Class 2 Production Licenses
<b>Solicitation No/Event ID:</b>	Georgia Procurement Registry Event ID #11232020
<b>Solicitation Close/Event End Date:</b>	Wednesday, January 27, 2021
<b>Notice of Intent to Award Posting Date:</b>	Saturday, July 24, 2021
<b>Class 1 Notice of Award Posting Date:</b>	Wednesday, September 21, 2022

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On May 5, 2022, the Georgia Access to Medical Cannabis (“GMCC”) conducted a duly noticed meeting and voted to designate the Georgia Office of State Administrative Hearings (“OSAH”) to fulfill the role and responsibilities as hearing officer to hear and decide all twenty-one (21) post-award protests to the respective Notices of Intent to Award Class 1 and Class 2 Production Licenses (“NOIAs”). On September 16, 2022, OSAH issued twenty-one (21) final decisions in which the judge made the same following decision for all:

“In accordance with the foregoing Findings of Fact and Conclusions of Law, Petitioner’s request for relief is **DENIED** and the GMCC’s decision to deny it a license is **AFFIRMED**. As of this date, all protests have been heard and decided. Accordingly, the GMCC may proceed with awarding licenses. **SO ORDERED**, this 16th day of September, 2022.”

GMCC published this official report to confirm the conclusion of the post-award protest process. Pursuant to Section 3.6 of GMCC’s Post-Award Protest Procedures, there are no additional administrative appeals.

<b>POST-AWARD PROTESTS TO NOIA FOR CLASS 1 PRODUCTION LICENSES</b>		
<b>PROTEST NO.</b>	<b>PROTEST PARTY</b>	<b>VALIDATED SCORE</b> (No Change to NOIA)
(Not Applicable)	Botanical Sciences LLC	970
(Not Applicable)	Trulieve Ga Inc	933.75
Protest No. 2021-PRO-00002	Aspire Medical Partners LLC	851.25
Protest No. 2021-PRO-00004	Curaleaf GA Holdings LLC	827.5
Protest No. 2021-PRO-00006	Windflower Georgia LLC	785
Protest No. 2021-PRO-00003	GA Bioscience Research Inc	770
Protest No. 2021-PRO-00005	Peach State Medicinals LLC	731.25
Protest No. 2021-PRO-00007	Pure Beauty GA LLC	703.75
Protest No. 2021-PRO-00011	ACC LLC	572.5

<b>POST-AWARD PROTESTS TO NOIA FOR CLASS 2 PRODUCTION LICENSES</b>		
<b>PROTEST NO.</b>	<b>PROTEST PARTY</b>	<b>VALIDATED SCORE</b> (No Change to NOIA)
(Not Applicable)	FFD GA Holdings LLC	893.75
(Not Applicable)	TheraTrue Georgia LLC	888.75
(Not Applicable)	Natures GA LLC	876.25
(Not Applicable)	Treevana Remedy Inc	870
Protest No. 2021-PRO-00002	Aspire Medical Partners LLC	851.25
Protest No. 2021-PRO-00013	Peach Health Alternatives LLC	832.5
Protest No. 2021-PRO-00004	Curaleaf GA Holdings LLC	827.5
Protest No. 2021-PRO-00003	GA Bioscience Research Inc	770
Protest No. 2021-PRO-00012	Harvest Connect LLC	745
Protest No. 2021-PRO-00015	Remedium Life Science of Georgia LLC	745
Protest No. 2021-PRO-00005	Peach State Medicinals LLC	731.25
Protest No. 2021-PRO-00007	Pure Beauty GA LLC	703.75
Protest No. 2021-PRO-00008	Cumberland Curative LLC	688.75
Protest No. 2021-PRO-00010	Pure Peach Organic Inc	686.25
Protest No. 2021-PRO-00011	ACC LLC	578.75

**EXHIBIT 4**  
**FY23-FY25 PROJECTED REVENUE COLLECTION**



# GEORGIA ACCESS TO MEDICAL CANNABIS COMMISSION FY23 REVENUE COLLECTION (PROJECTED)

(Rev 01/25/23)

## APPLICATION FEES

Class 1 Production														
Class 2 Production														
(12) Dispensing									\$ 60,000					\$ 300,000
<b>\$360,000</b>	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 60,000	\$ -	\$ -	\$ -	\$ -	\$ 300,000

## LICENSE FEES

(2) Class 1 Production			\$ 400,000											
(4) Class 2 Production														\$ 400,000
(12) Dispensing									\$ 140,000					\$ 700,000
<b>\$1,640,000</b>	\$ -	\$ -	\$ 400,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 140,000	\$ -	\$ -	\$ -	\$ -	\$ 1,100,000

## RENEWAL FEES

Class 1 Renewals														
Class 2 Renewals														
Dispensing Renewals														
<b>\$0</b>	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -

## REGISTRATION FEES

(1) Submission fees									\$ 5,000					
(1) Independent Laboratory									\$ 15,000					
Registration Renewals														
<b>\$20,000</b>	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 20,000	\$ -	\$ -	\$ -	\$ -	\$ -

## ADMINISTRATIVE FEES

Miscellaneous fees														
<b>\$ -</b>	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -

<b>TOTALS</b>	\$ -	\$ -	\$ 400,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 220,000	\$ -	\$ -	\$ -	\$ -	\$ 1,400,000
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## TOTAL REVENUE COLLECTED

**\$2,020,000**

(FY23 PROJECTED)



GEORGIA ACCESS TO MEDICAL CANNABIS COMMISSION  
FY24 REVENUE COLLECTION (PROJECTED)

(Rev 01/25/23)

APPLICATION FEES

Class 1 Production													
Class 2 Production													
(24) Dispensing			\$ 240,000			\$ 240,000			\$ 240,000				
<b>\$720,000</b>	\$ -	\$ -	\$ 240,000	\$ -	\$ -	\$ 240,000	\$ -	\$ -	\$ 240,000	\$ -	\$ -	\$ -	\$ -

LICENSE FEES

Class 1 Production													
Class 2 Production													
(24) Dispensing			\$ 560,000			\$ 560,000			\$ 560,000				
<b>\$1,680,000</b>	\$ -	\$ -	\$ 560,000	\$ -	\$ -	\$ 560,000	\$ -	\$ -	\$ 560,000	\$ -	\$ -	\$ -	\$ -

RENEWAL FEES

(2) Class 1 Renewals			\$ 200,000										
(4) Class 2 Renewals												\$ 200,000	
(12) Dispensing Renewals								\$ 140,000				\$ 700,000	
<b>\$1,240,000</b>	\$ -	\$ -	\$ 200,000	\$ -	\$ -	\$ -	\$ -	\$ 140,000	\$ -	\$ -	\$ -	\$ 900,000	

REGISTRATION FEES

(2) Submission fees						\$ 10,000							
(2) Independent Laboratory						\$ 30,000							
(1) Registration Renewals								\$ 40,000					
<b>\$80,000</b>	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 40,000	\$ -	\$ 40,000	\$ -	\$ -	\$ -	\$ -	\$ -

ADMINISTRATIVE FEES

Miscellaneous fees													
<b>\$0.00</b>	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -

<b>TOTALS</b>	\$ -	\$ -	\$ 1,000,000	\$ -	\$ -	\$ 840,000	\$ -	\$ 180,000	\$ 800,000	\$ -	\$ -	\$ 900,000	
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TOTAL REVENUE COLLECTED

**\$3,720,000**

(FY24 PROJECTED)



**GEORGIA ACCESS TO MEDICAL CANNABIS COMMISSION**  
**FY25 REVENUE COLLECTION (PROJECTED)**

(Rev 01/25/23)

**APPLICATION FEES**

Class 1 Production													
Class 2 Production													
(6) Dispensing						\$ 180,000							
<b>\$180,000</b>	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 180,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -

**LICENSE FEES**

Class 1 Production													
Class 2 Production													
(6) Dispensing						\$ 420,000							
<b>\$420,000</b>	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 420,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -

**RENEWAL FEES**

(2) Class 1 Renewals			\$ 200,000										
(4) Class 2 Renewals												\$ 200,000	
(36) Dispensing Renewals			\$ 560,000			\$ 560,000		\$ 140,000	\$ 560,000			\$ 700,000	
<b>\$2,920,000</b>	\$ -	\$ -	\$ 760,000	\$ -	\$ -	\$ 560,000	\$ -	\$ 140,000	\$ 560,000	\$ -	\$ -	\$ 900,000	

**REGISTRATION FEES**

Submission fees													
Independent Laboratory													
(3) Registration Renewals						\$ 80,000		\$ 40,000					
<b>\$120,000</b>	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 80,000	\$ -	\$ 40,000	\$ -	\$ -	\$ -	\$ -	\$ -

**ADMINISTRATIVE FEES**

Miscellaneous fees													
<b>\$0.00</b>	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
<b>TOTALS</b>	\$ -	\$ -	\$ 760,000	\$ -	\$ -	\$ 1,240,000	\$ -	\$ 180,000	\$ 560,000	\$ -	\$ -	\$ 900,000	

**TOTAL REVENUE COLLECTED**

**\$3,640,000**

(FY25 PROJECTED)